

**UNITED STATES FEDERAL COURT
SOUTHERN DISTRICT OF NEW YORK**

RODNEY JONES,

Plaintiff,

-against-

SEAN COMBS,
JUSTIN DIOR COMBS,
CUBA GOODING JR.,
LUCIAN CHARLES GRAINGE,
KRISTINA KHORRAM,
LOVE RECORDS,
MOTOWN RECORDS,
UNIVERSAL MUSIC GROUP,
COMBS GLOBAL ENTERPRISES,
JOHN and JANE DOES 1-10 and
ABC CORPORATIONS. 1-10,
Defendants.

Case No.: 24-cv-01457

**DECLARATION OF
TYRONE BLACKBURN
IN OPPOSITION TO COMBS
DEFENDANTS (minus Justin Combs)
MOTION TO DISMISS AND REQUEST
TO TAKE JUDICIAL NOTICE OF
COMBS FEDERAL INDICTMENT**

I, Tyrone A. Blackburn, Esq., declare according to 28 U.S.C. §1746 as follows:

1. I am over eighteen years old and am Counsel to Rodney Jones ("Plaintiff") in this action. I make this declaration in opposition to combs defendants (minus Justin Combs) motion to dismiss and request to take judicial notice of combs federal indictment.
2. See attached **Exhibit 1**, a true and correct copy of the unsealed criminal indictment captioned: *USA v. Combs*; 24-cr-542.
3. See attached **Exhibit 2**, a true and correct copy of:
 - a. in the matter of *Graves v. Combs et al.*, United States District Court, Southern District of New York, Case No 1:24-cv-07201-AT;
 - b. in the matter of *English v. Combs et al.*, United States District Court, Southern District of New York, Case 1:24-cv-05090-AT;
 - c. in the matter of *Jane Doe v. Combs et al.*, United States District Court, Southern District of New York, Case 1:23-cv-10628-JGLC;
 - d. in the matter of *USA v. Combs et al.*, United States District Court, Southern District of New York, Case 1:24-cr-00542-ALC;
 - e. in the matter of *McKinney v. Combs et al.*, United States District Court, Southern District of New York, Case 1:24-cv-03931-NRB; and
 - f. in the matter of *Richard v. Combs et al.*, United States District Court, Southern District of New York, Case 1:24-cv-06848-KPF.

Under penalty of perjury under the laws of the United States of America, I declare that the preceding is true and correct. I understand that if I intentionally lie, I will be punished.

Dated: September 30, 2024

/s/Tyrone A. Blackburn, Esq.

Tyrone A. Blackburn, Esq.
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